

112391

**Doubleday
Book & Music Clubs, Inc.**

Office of the
Secretary & Counsel

RECEIVED JUL 29 1988

July 28, 1988

Mr. Michael Towle
Remedial Enforcement Project Officer
U.S. Environmental Protection Agency
Region III
PA CERCLA Remedial Enforcement Section (3HW12)
P.O. Box 3409
Reston, VA 22091

Dear Mr. Towle:

RE: 3HW12

First, thank you for extending the response period to allow us time to collect the necessary data. This will respond specifically to your request for information concerning the investigation of the Keystone Sanitation Landfill in Adams County, Pennsylvania. This also incorporates a few points discussed with you 7/21/88 and with Eileen De Milt 7/15/88.

Our information concerning use of this landfill will be limited to the time period from 1974 to present as prior to this time we (i.e. our disposer) did not utilize this landfill. In the spirit of good faith compliance, we have extensively reviewed applicable statutes (e.g. including all of 42 USC 6901 et seq.) in light of our business operations. To specifically address your questions:

1. The Doubleday Book & Music Clubs, Inc.'s Hanover facility is presently utilized for book distribution, warehousing and lettershop functions. The book distribution and warehousing function services the orders/mailings to members of book clubs operated by Doubleday Book & Music Clubs, Inc. The lettershop is used to collate and mail advertising literature to our club members and, in some cases, for outside mailers. This facility is normally in operation from 7 a.m. to midnight from Monday through Friday.

AR200329

2. Doubleday & Company, Inc. operated this facility from 1947 until 7/1/87. As a result of the company's purchase by Bertelsmann, Inc. 12/87 and the subsequent restructuring, this facility was transferred to Doubleday Book & Music Clubs, Inc. effective 7/1/87.
3. Doubleday Book & Music Clubs, Inc. is a wholly-owned subsidiary of Bertelsmann, Inc., 666 Fifth Avenue, New York, New York. Doubleday Book & Music Clubs, Inc. has its principal office at 501 Franklin Avenue, Garden City, New York with Marketing and Editorial areas located at 245 Park Avenue, New York, New York.
4. From 1947 until 1976 this plant was a book manufacturing and distribution facility; the operation of which consisted of a pressroom, bindery and shipping operation. There was also a composition operation which made printing plates - this consisted of a hot metal linotype foundry, a proofreading department and a computer tape perforating room.

In 1976, the pressroom and bindery were removed. At the same time, the lettershop was installed.

The composition department was phased out in June of 1983. After this time, the plant operations are as described in Response #1.

5. When this plant was operated as a manufacturing facility, it used paper, glue, ink, cardboard cloth, lead and rubber. Methyl ethyl ketone (MEK) was utilized to thin the glue and other solvents such as trichloroethane, methyl amyl acetate were used but they never became part of the waste stream. Cleaning agents used during this time frame included naptha, trichloroethane, and varsol. Other fluid wastes were hydraulic oil, brake fluid, motor oil, and gear oil. Prior to 1985, these fluids were destroyed by burning them in the plant heating boilers (a sample listing of the chemicals and quantities burned is provided herewith). Subsequently, they have been deposited in drums and sent to Industrial Solvents and Chemical Company for disposal.

The only potentially hazardous byproduct of any production process was the dross which resulted from the smelting of metal type into ingots to be used on linotype machines. This was skimmed off the molten metal before the ingots were poured. This was collected in drums and forwarded to Imperial Metal & Chemical Company. This firm reclaimed the metals out of the dross for resale and was in conflict with

AR200330

the Environmental Protection Agency as to whether dross was considered hazardous material. Dross has not been produced since 6/83 with the removal of the typesetting machine.

The current lettershop and book distribution functions utilize preprinted (oil based inks) paper materials, cardboard cartons, paper packing material, adhesive tape, hot and cold glues, and ink in the production processes. The cleaning agents used (outside of ordinary sanitary household cleaners), include Varsol 624 and Sentry GU Safety Solvent (1,1,1 trichloroethane).

6. The dross byproduct of the manufacturing function was collected in special drums and sent to Imperial Metal & Chemical Company for recycling/disposal. Up to 1985, the fluids described in the first paragraph of Response #5 were burned in our heating boilers in a controlled and proper manner. After this time, said fluids were deposited in drums and disposed of by Industrial Solvents & Chemical Company. As the documents provided herewith attest, the quantities disposed of were minimal (no more than eight 55 gallon drums over a period of two years and two months). Said fluid wastes which consisted of cleaning and lubricating fluids were segregated from other wastes by the collection of same in drums for appropriate waste disposal.
7. Keystone Sanitation has been used by the Hanover facility from September, 1974 to present.
8. The wastes disposed of by the Hanover facility which were sent to the Keystone Sanitation Landfill consisted mainly of printed paper (other than that which was sent to a recycler as waste paper), book bindings, wood, incidental production material scraps, plastic strapping, ordinary refuse from trash collection receptacles, empty containers from cleaning and other miscellaneous products, failed fluorescent light ballasts (may have contained PCB capacitors), discarded goods and equipment. The wastes are generally collected from a dumpster approximately 3-4 times a month.

Our production waste is primarily (95-98%) composed of paper and cardboard material which is baled and sold to recyclers. All scrap metal is collected and sold to scrap dealers; and batteries replaced are returned to the battery supplier for an allowance (itemized in Response #9).

9. Since we began using Keystone Sanitation in 1974, ~~we have~~ **AR 200331**

listed the companies utilized from this point forward:

- a. **Keystone Sanitation Company, Inc.**
355 Clouser Road, Hanover, PA 17331
On an average, they remover four dumpster loads from the plant each month. Copies of invoices from the past seven years are provided herewith (prior invoices have been destroyed in accordance with a formal record retention practices). Also provided is a copy of their Keystone Landfill permit.
- b. **Imperial Metal & Chemical Company**
344 Aramingo Avenue, Philadelphia, PA 19134
This firm was utilized for Linotype Dross disposal up until June, 1983. A sample purchase requisition is provided herewith (further records are available upon request). This firm indicated that they did not have a license to process waste as they did not believe dross to be a hazardous material and disputed this with the Environmental Protection Agency as the metals were reclaimed out of the dross and then resold. As indicated, we discontinued production of dross 6/83 and, in addition, this firm no longer handles dross.
- c. **Industrial Solvents & Chemical Company**
P.O. Box 158, Emigsville, PA 17318
This firm is utilized for the disposal of drums of cleaning solvents, lubricants and brake fluid. Copies of Generators Waste Material Profile Sheet, Uniform Hazardous Waste Manifests and Material Safety Data Sheets are provided herewith. Also provided is a copy of this firm's EPA Acknowledgment of Notification of Hazardous Waste Activity and the various pertinent permit numbers.
- d. **General Electric Company**
1040 E. Erie Avenue, Philadelphia, PA 19124
This firm was retained for the removal of 18 PCB capacitors from the Hanover plant and proper disposal of same in accordance with laws and regulations on point. Documentation on point provided herewith includes the price quotation, the terms and conditions regarding removal and disposal, a description of the PCB capacitors at the facility, Uniform Hazardous Waste Manifest, Confirmation of Destruction and appropriate Certificate of Compliance, and Toxic Substance Control Act Notice of Inspection.

Other means were also employed by the plant for the disposal of wastes. These included:

AR200332

- e. These firms purchased scrap metal for recycling:

Gastley's Scrap Iron & Metals
1957 York Road
Gettysburg, PA 17325

Hanover Recycling Center
213 Poplar Avenue
Hanover, PA 17331

Wagaman Iron & Metal
Rd #7
Gettysburg, PA 17325

Material Safety Data sheets and representative sample receipts for scrap metal provided herewith.

- f. These firms purchased scrap paper, cardboard materials, and books to be destroyed for recycling:

Carolina Paperboard
425 Gardner Avenue
P.O. Box 668305
Charlotte, NC 28266

Hanover Scrap Processing Company
213 Poplar Street
Hanover, PA 17331

S.S. Linmart
535 B Southlawn Lane
Rockville, MD 20850

Representative sample invoices and shipping orders provided herewith.

- g. All industrial batteries used for the lift trucks were sold back as scrap trade-ins to the supplier when replacements were obtained. Representative sample purchase quotes including the old battery scrap allowance are provided herewith along with the appropriate Product Safety Data Sheets.
- h. Cleaning solvents, fluids and oils, utilized in the plant also end up on towels used in the cleaning and lubricating of equipment. Such towels are rented and replaced/laundered by outside firms. The firms utilized are:

AR200333

Rental Uniform Service
Blettner Avenue
Hanover, PA 17331

Coyne Industrial Laundries Inc.
3500 W. Market Street
York, PA 17404

Representative sample agreements are provided herewith.

10. The fluid wastes identified herein currently produced at this facility are collected in drums which are disposed of by Industrial Solvents & Chemical Company. As indicated in Response #5, prior to 1985, these wastes were burned in the plant heating boilers (see itemization of larger quantities provided herewith). From 1985 to present, the fluid wastes amounted to eight 55 gallon drums. As indicated earlier, dross was disposed of through Imperial Metal & Chemical Company but as of 6/83 was no longer produced. At no point in time were any fluid wastes sent to the Keystone Sanitation Landfill.
11. Response #8 identifies the materials disposed of at the Keystone Sanitation Landfill. Material Safety Data sheets are provided herewith as to empty cleaning, solvent and miscellaneous containers which were disposed of there (these are included for full disclosure as to any possible trace amounts which may have remained in said containers). The products, themselves, however were not disposed of at the landfill as they were utilized in the facility.
12. Provided herewith is a copy of Keystone Sanitation Company Landfill Permit. To our knowledge, no other firm was retained for disposal of any waste utilized this landfill.
13. Since we did not ship hazardous materials, this is inapplicable.
14. Our company is not privately insured against release of hazardous substances or wastes.

Also enclosed for your review are the:

1. Hazardous Substance Survey Form completed for this facility;
2. Hanover Plant Hazardous Communication Program Guide;
3. Chemical Hazard Communication Statement; and
4. Hazard Communication labels utilized.

AR200334

Please note that there is also a training film utilized in

Page 7
Mr. Michael Towle
7/28/88

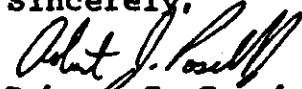
accordance with the Hazard Communication Program which is available for your viewing if you'd so choose.

We believe the materials provided will fulfill your written requirements and as a follow up to our 7/21/88 conversation. Representative samples of invoices, receipts, etc. have been provided so that you can determine if any further documentation is necessary. This was done to alleviate a possible tone of irrelevant materials and to comply with a timely response to your information request.

With regard to your reference of business confidentiality, we have reviewed the text of 40 C.F.R. 2.201 and related regulations. In all candor, we can assert no material claim to business confidentiality. However, we would appreciate your treating this information in the same spirit of good faith we have used in our response.

If you need further clarification or documentation, please contact me.

Sincerely,



Robert J. Posch, Jr.

CC: Mr. Andrew Danek, Vice President

RJP/lr
c/EPARespo

AR200335